

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, Sarah Silverman, Christopher
Golden, Ta-Nehisi Coates, Junot Díaz, Andrew
Sean Greer, David Henry Hwang, Matthew Klam,
Laura Lippman, Rachel Louise Snyder, Jacqueline
Woodson, and Lysa TerKeurst,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THE SECOND
CONSOLIDATED AMENDED
COMPLAINT**

The Court has considered Plaintiffs' Administrative Motion to File Under Seal Portions of the Second Consolidated Amended Complaint and the Declaration of Christopher K.L. Young submitted in support thereof. The Court finds the identified materials in the marked paragraphs of the Second Consolidated Amended Complaint in the chart below are extremely sensitive Confidential Information or Items, disclosure of which to another Party or Non-Party would create a substantial risk of serious harm that could not be avoided by less restrictive means and that the highlighted portions of those paragraphs are narrowly tailored to seal only the sealable material.

FCAC Paragraph	Description of Information	Ordered Sealed
54	Information Meta contends is protected by the attorney-client privilege.	
56	Information Meta contends is protected by the attorney-client privilege.	
59	Information Meta contends is protected by the attorney-client privilege.	
60	Information Meta contends is protected by the attorney-client privilege.	
61	Information Meta contends is protected by the attorney-client privilege.	
62	Information Meta contends is protected by the attorney-client privilege.	

The Motion is hereby GRANTED with regard to each of the marked paragraphs in the table above and orders that they be redacted in the public filing and maintained under seal.

IT IS SO ORDERED.

Dated _____, 2024

HON. VINCE CHHABRIA
United States District Judge